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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**

**DISTRICT OF ALASKA**

ELIZABETH BAKALAR,

Plaintiff,

Case No. 3:19-cv-00025 JWS

vs.

MICHAEL J. DUNLEAVY, in his  
individual and official capacities;  
TUCKERMAN BABCOCK; and the STATE  
OF ALASKA,

Defendants.

**JOINT RESPONSE TO ORDER AT DOCKET 99 TO SUBMIT PROPOSED  
PRE-TRIAL DEADLINES**

JOINT RESPONSE TO ORDER DKT 99 WITH PROPOSED  
PRE-TRIAL DEADLINES  
*Bakalar v. Dunleavy, et al.* Case No. 3:19-cv-00025 JWS  
Page 1 of 2

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The parties conferred and jointly respond to the Order at Docket 99, proposing the following remaining pre-trial deadlines:

Final Damages witness lists	April 4, 2022
Expert Report disclosures	June 17, 2022
Deadline completion of discovery	August 15, 2022
Discovery Motions Deadline	September 9, 2022
Dispositive Motions re damages	September 9, 2022
Motions in Limine	October 7, 2022
Dated: February 22, 2022	CHOATE LAW FIRM LLC Attorneys for Plaintiff

*/s/ Mark Choate*

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By: Mark Choate, 8011070

Dated: February 22, 2022	LANE POWELL LLC Attorneys for Defendant
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*/s/ Brewster H. Jamieson*

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By: Brewster H. Jamieson, #8411122